

1 BILAL A. ESSAYLI
United States Attorney
2 JENNIFER L. WAIER
Assistant United States Attorney
3 First Assistant United States Attorney
Assistant United States Attorney
4 California Bar Number: 209813
312 N. Spring Street
5 Los Angeles, California 90012
Telephone: (714) 338-3550
6 E-mail: Jennifer.Waier@usdoj.gov

7 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 MANUCHEHR KHOSHBIN,
16 Defendant.
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Case No. SA CR 25-26-FWS
GOVERNMENT'S RESPONSE TO
PRESENTENCE REPORT

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19 Plaintiff United States of America, by and through its counsel
20 of record, Jennifer L. Waier, having received and reviewed the

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1 Presentence Report for defendant Manuchehr Khoshbin, submits the
2 government's response to the Presentence Report.

3 Dated: July 10, 2025

Respectfully submitted,

4 BILAL A. ESSAYLI
5 United States Attorney

6 Jennifer L. Waier
7 JENNIFER L. WAIER
8 Assistant United States Attorney
Attorneys for Plaintiff
United States of America

1 Defendant Manuchehr Khoshbin pleaded guilty to a single-count
2 information charging defendant with violating 26 U.S.C. § 7203, a
3 misdemeanor.

4 The Probation Office has determined that defendant's Total
5 Offense Level with acceptance of responsibility is 15 and Criminal
6 History Category is I. Thus, the advisory sentencing guideline
7 range is 12 months' imprisonment. The government agrees with the
8 Total Offense Level and Criminal History Category calculation in the
9 Presentence Report ("PSR").

10 Accordingly, in accordance with the Plea Agreement and the PSR,
11 the government requests that defendant receive the following low-end
12 sentence: a one-year term of probation under the conditions
13 specified in the PSR. Defendant should also be ordered to pay a \$25
14 special assessment and \$1,380,932 in restitution.

15 This sentence is consistent with the applicable factors
16 delineated in 18 U.S.C. § 3553(a) and therefore is just punishment
17 as it instills the seriousness of the committed offense.